

Jeremy Johnson  
REC'D

JAN 08 2003

STATE OF MISSOURI      Bob Holden, Governor • Stephen M. Mahfood, Director  
**DEPARTMENT OF NATURAL RESOURCES RCAP**

www.dnr.state.mo.us

December 31, 2002

Mr. Joseph Haake  
Group Manager  
The Boeing Company  
Dept. 464C, Bldg. 220  
Mail Code S221-1400  
P.O. Box 516  
St. Louis, MO 63166-0516

RE: Approval of the site investigation work and revised Investigative Threshold Levels (ITLs) contained in the RCRA Facility Investigation (RFI) Annual Monitoring Report for SWMU 17 at the Boeing Facility, Hazelwood, Missouri; Permit #MOD00818963

Dear Mr. Haake:

The Missouri Department of Natural Resources' Hazardous Waste Program (HWP) has completed review of the revised RFI Annual Monitoring Report/Work Plan dated October 29, 2002, for SWMU 17. The revised Report/Work Plan was submitted to address concerns raised by HWP project staff in an October 17, 2002, comment letter. The revised Report/Work Plan is intended to facilitate continued characterization of the contamination at SWMU 17 and is based on the results of investigation previously conducted in the SWMU 17 area. The HWP hereby approves the site investigation work and revised ITLs contained in the October 29, 2002, revised Report/Work Plan with the following comments.

The HWP understands that the continuing work at SWMU 17 is a part of the Statement of Work for the Tract I South Property environmental investigation agreement with the Airport Authority. In regard to the entire Tract I property, the HWP is currently aware of two primary areas where contamination has been found above ITLs, SWMU 17 and the GKN Property. The major investigation concerns at this time involve contaminant migration from these areas. In the Hydrogeologic Assessment of McDonnell Douglas Corporation Tract I and Tract II Report of May 1989, PCE and breakdown products were identified in MW 5 near Building 41, and MW-6 near Building 45. The Tract I South Property Investigation should include an assessment of whether the contamination detected in these wells is due to contamination from SWMU 17, the GKN Property or another source.

*Integrity and excellence in all we do*



R00405929  
RCRA RECORDS CENTER

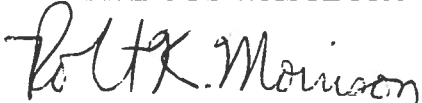
Mr. Joseph Haake  
December 31, 2002  
Page 3

In regard to the SWMU 17 investigation, it appears that the shallow and intermediate zones have been adequately characterized. However, there is only one deep monitoring well associated with this site (MW-11D). The concern over the lack of deep characterization at SWMU 17 has been communicated to Boeing on a number of occasions, and a recent deep boring south of Building 41 indicates the presence of chlorinated organic compounds in this deeper zone. In addition, the geology at both SWMU 17 and Building 41 appear to be very similar. Initially, the substantial thickness of low permeability clay present in the subsurface coupled with the potential to cause cross contamination of deeper strata if investigatory borings were installed at or near the SWMU 17 source area were the basis upon which further characterizing the deeper zone in the source area at SWMU 17 was not pursued. However, the additional investigations planned for the Tract I property offers a good opportunity to efficiently collect additional information about the deep zone near this area by augmenting the plan negotiated with the Airport Authority. In the Tract I Work Plan, a deep boring is proposed at the southeast corner of Building 48 as part of the investigation of petroleum related compounds. To address the potential presence of deep VOCs, it is recommended that volatile organic compounds be included in the analysis of groundwater from this boring. This would be valuable information regarding potential deep contaminant migration from SWMU 17. Then, based upon the results from that analysis, decisions could be made as to whether it may be necessary to step out northward and/or westward to further delineate the extent of the contamination in the deep zone. In this fashion, it may be possible to adequately delineate contamination in the deep zone on the Tract I South property.

The department's HWP would like to commend Boeing for its continued cooperation in investigating and remediating contamination on the Tract I property. If you have any questions concerning this letter or its recommendations, please do not hesitate to contact Mr. Patrick Quinn of my staff at (573) 751-3553.

Sincerely,

HAZARDOUS WASTE PROGRAM



Robert K. Morrison, P.E.  
Chief, Permits Section  
Permits Section

RKM:pqm

c: Ms. Joletta Golik, Airport Authority  
Mr. Jeremy Johnson, U.S. EPA Region VII ✓  
St. Louis Regional Office